

ORIGINAL

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

2022 MAR -7 PM 3:51

DEPUTY CLERK

UNITED STATES OF AMERICA

v.

CLOIS GLENN RABORN (01)

No. **4-22CR-066-0**

INFORMATION

The United States Attorney Charges:

Count One
Sexual Exploitation of a Child
(Violation of 18 U.S.C. §§ 2251(a) and (c))

Between on or about June 1, 2016, and on or about February 28, 2019, in the Fort Worth Division of the Northern District of Texas, defendant **Clois Glenn Raborn** did use, persuade, induce, entice and coerce a minor, Minor Victim 1, to engage in sexually explicit conduct for the purpose of producing any visual depiction of such conduct, and the visual depiction was produced using materials that had been mailed, shipped, and transported in and affecting interstate and foreign commerce by any means, including by computer.

Specifically, **Raborn** used an Apple iPhone 6s IMEI unknown, a silver HP Laptop computer serial number 5CH1411BW3 with Lite-On LA-512M3S-Z1 512GB SSD serial number 002241118539, and a Silver MultiCard 16GB USB serial number 0XECC3800678047, to produce the following visual depiction of a minor engaged in sexually explicit conduct:

File Name	File Description
7e0bd000742d0f01.bmp	An image with Raborn's fingers moving MV1's underwear to the side, exposing her genitals. Raborn's penis is visible on top of MV1's leg.

In violation of 18 U.S.C. §§ 2251(a) and (c).

Forfeiture Notice
(18 U.S.C. § 2428)

Upon conviction of the offense alleged in Counts One and Two and pursuant to 18 U.S.C. § 2428, defendant **Raborn** shall forfeit to the United States of America (a) any property, real or personal, that was used or intended to be used to commit or to facilitate the commission of the respective offense; and (b) any property, real or personal, constituting or derived from any proceeds that such person obtained, directly or indirectly, as a result of the respective offense.

The above-referenced property subject to forfeiture from the defendant includes, but is not limited to, any interest of the defendant in the following:

1. Silver HP Laptop computer serial number 5CH1411BW3, and
2. Silver MultiCard 16GB USB serial number 0XECC3800678047

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